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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

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In the Matter of )

Federal-State Joint Board on )  
Universal Service )

CC Docket No. 96-45

### RESPONSES OF BELL ATLANTIC<sup>1</sup> TO DATA REQUESTS

The Commission has required Bell Atlantic<sup>2</sup> to respond to a number of data requests in connection with its universal service proceeding.<sup>3</sup> These requests are designed to assist the Commission in selecting a forward-looking cost mechanism<sup>4</sup> for use in calculating support for non-rural local exchange carriers serving rural, insular and high-cost areas.<sup>5</sup> The deadline for responding to several of the requests has been extended until September 12, 1997.<sup>6</sup>

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<sup>1</sup> The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company.

<sup>2</sup> This response includes information concerning the former NYNEX telephone companies, which have merged with Bell Atlantic.

<sup>3</sup> **Order**, DA 97-1433 (rel. July 9, 1997) ("Order").

<sup>4</sup> The Commission should use actual costs, rather than hypothetical forward-looking costs, in determining the cost of providing telephone service for calculated high-cost support.

<sup>5</sup> Order at ¶ 1.

<sup>6</sup> **Order**, DA 97-1728 (rel. Aug. 14, 1997).

The attached responses provide the requested Bell Atlantic data for each of the responses for which the date was not extended.

As contemplated in the Order,<sup>7</sup> the responses to several of the data requests contain confidential information that is routinely withheld from public inspection pursuant to the Freedom of Information Act<sup>8</sup> and the Commission's Rules.<sup>9</sup> The requests for which confidential treatment is requested are listed below, together with the justification required by the Rules.<sup>10</sup> As the Order requires, attached is a "Designation of Confidential Information" form signed by an officer of Bell Atlantic, certifying that the information cited below is confidential.<sup>11</sup>

The information listed below consists of trade secrets and commercial or financial information that is protected by law from public disclosure.<sup>12</sup>

1. Data Request No. 1, Loops. The information provided under this request consists of detailed data specifying the number of various types of loop facilities installed for each wire center, broken down by type of customer served (residential, single-line business, and multi-line business). This information would enable competitors to determine how many of each type of customer that the telephone company serves from each wire center. Disclosure of these data would enable a competitor to target its facility construction and sales and marketing efforts to the areas with the highest concentrations of high-volume customers and avoid those that may not produce as high sales or revenue volumes. It is, therefore, competitively-sensitive and should be withheld from public inspection.

2. Data Request No. 12, Digital Switches. This question asks for the installed price of each digital switch installed during the past two years and the number of lines served by each. The

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<sup>7</sup> Order at ¶ 8.

<sup>8</sup> 5 U.S.C. § 552(b).

<sup>9</sup> 47 C.F.R. § 0.457.

<sup>10</sup> 47 C.F.R. § 0.459.

<sup>11</sup> *See* Order at ¶ 8.

<sup>12</sup> *See* 5 U.S.C. § 552(b)(4), 47 C.F.R. § 457(d).

price is confidential cost information that a competitor could use in purchasing its own switches and pricing its own services. In addition, under contracts with switch vendors, Bell Atlantic is prohibited from disclosing publicly the price paid for the switches. The number of lines served by each switch is competitively-sensitive for the reasons discussed in Data Request No. 1, above.

3. Data Request No. 13, Contracts with Switching Manufacturers, and Data Request No. 21, Contracts with Digital Line Carrier Manufacturers. These requests require submission of copies of vendor contracts. Provisions of those contracts prohibit public disclosure of their contents. In addition, the prices and terms of equipment purchases are confidential information that a competitor could use in purchasing its own equipment or pricing its own services.

The confidential information is so marked and is being provided pursuant to the requirements of paragraph 8 of the Order. The public version, without the confidential information, is being filed pursuant to paragraphs 12 and 13 of the Order.

Respectfully Submitted,



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August 15, 1997

DESIGNATION OF CONFIDENTIAL INFORMATION

I hereby certify that the information designated as confidential in the attached responses to the Universal Service Data Request is protected by Bell Atlantic as confidential or financial information:

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